Remarks

The Applicant requests reconsideration of claims 2-5, 7-9 and 12-15 as previously presented.

In the Office Action, the Examiner rejected claims 2-5, 7-9 and 12-15 under 35 U.S.C. 103(a) as being unpatentable over Haig Michael Zadikian et al. (U.S. Patent No. 6,631,134), and in view of Doublas A. Holmberg (U.S. Patent No. 6,041,932). Applicant has considered the Examiner's rejection and respectfully requests the Examiner to reconsider allowability of claims 2-5,7-9 and 12-15 for the reasons outlined below.

The present invention, as recited in independent claims 12-15, and described in the application, defines a sub-grouping where a sub-group is formed when a slot, a power service module and a functional module of the associated functional group each share at least one alpha identifier, numeric identifier and colour graphic identifier. By utilizing the said labeling scheme in a network platform, an advantage of the current invention is described in the specification at page 8, lines 4-8, which states "the overall layout and numbering scheme of the functional groups also facilitates quick and error free location of a particular component by a technician by presenting the labeling information in a manner which corresponds to text presented on the page of a book in the English language". Therefore, the visual identifiers used in the current invention aids in the identification of a sub-group of a networking system where said sub-group comprises of a slot, power service module and functional module.

In response to the Examiner's rejection to independent claims 12-15, stating that Zadikian et al. taught "each slot [Fig. 4], power service module of a functional group [SP,SM,LC], being associated with a sub group [one SM 420, and four LC410]". Applicant respectfully notes that the Examiner has apparently misread claims 12 -15, which define "each slot, power service module and functional module of a functional group". Claims 12-15 and dependent claims thereon should be allowable for the following reasons

Applicant respectfully submits that Holmberg does not disclose or teach visual identifiers to identify a sub-group comprising a slot, power service module and functional module of a functional group. In fact, nothing in Holmberg would lead one skilled in the art to such an arrangement. Instead, general descriptors of a system to organize, store and dispense a plurality of tablets in a predetermined therapeutic regime comprising a plurality of sets of separate packets, is provided. Therefore, it is submitted that the claims on file are neither anticipated nor obvious in view of Holmberg.

Applicant respectfully submits that Zadikian et al. does not disclose or teach a system or method to identify a sub-grouping where a sub group is formed when a slot, power service module and functional module of a functional group is provided with a respective visual identifier for slot module identification. In fact, Zadikian et al. teaches away from the claimed invention by limiting groups to a set of slots on a shelf. This is confirmed by Zadiklan et al. on FIG 4 and Col 13, lines 7-8, which states that "A group is made up of line cards occupying a number of slots on a shelf.". Application notes that this definition of group does not imply a sub-group formed when a slot, power service module and functional module of a functional group is provided with a respective visual identifier for slot module identification where the visual identifier consists of an alpha, numeric and color identifier. Applicant further notes that the power service module specified in the present invention was not disclosed nor taught in Zadikian et al. Instead, Zadikian et al. on Col 13, lines 35-37 states that power is provided to each of the I/O shelf modules via a general power bus on the backplane. As such, nothing in Zadikian et al. would lead one skilled in the art to a sub-grouping where a sub group is created for each slot on the network platform and consists of a power service module and functional module from at least one additional functional group and where each subgroup element shares at least one visual identifier. Therefore, it is submitted that the claims on file are neither anticipated nor obvious in view of Zadikian et al.

Applicant submits that none of Zadikian et al. or Holmberg, either alone or in combination, teach or suggest the invention recited in independent claims 12-15, or any claims that depend from them.

In response to the Examiner's objection to Claim 4 and 9, stating that it would have been obvious to modify the teachings of Zadikian to include Holmberg's

teaching of visual identifiers, for the purpose of identification, each of these claims adds further limitations for independent Claims 12-15 and should therefore be allowable for the reasons stated above. Moreover, the color identifiers described in Holmberg is in reference to a technique for organizing predetermined therapeutic regime comprising a plurality of sets of separate packets and and does not provide the functionality and advantages of the colour-coding labeling scheme detailed in the present invention to identify a sub-group comprising a slot, power service module and functional module of a functional group

In response to the Examiner's objection to claim 3 and 8 stating that Zadikian teaches a functional group that is provided with a label associated with it, the said claim adds further limitations for independent Claims 12-15 and should be therefore be allowable for the reasons stated above.

In response to the Examiner's objection to claim 2 and 7 stating that Zadikian teaches an alpha identifier, a numeric identifier or a color identifier, said claim adds further limitations for independent claims 12-15 and should be allowable for the reasons stated above.

In response to the Examiner's objection to claim 5 stating that Zadikian teaches a port side and a switch side, the said claim adds further limitations for independent claims 12-15 and should be allowable for the reasons stated above.

As all the cited references fail to disclose a sub-grouping where a sub group is formed when a slot, power service module and functional module of the associated functional group each share at least one alpha identifier, numeric identifier and color graphic identifier, it is apparent that, even should the motivation to combine them exist, the resulting combination would not provide all the present claim limitations. Applicant therefore requests reconsideration of claims 2-5, 7-9, 12-15 and withdrawal of the rejections under 35 U.S.C. 103(a).

In view of the above amendments and discussion, the Applicants request early allowance of the amended application.

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Yours very truly,

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